



# Source Control in the Lower Duwamish Waterway

## Planning Update

April 24, 2012

# Source Control Update

- Continue discussions with EPA about Proposed Plan and ROD
- Negotiations continue with agency and municipal partners
- Planning documents under development

# Planning for Future Source Control

## Coordination Documents

**Strategic Plan**

**Agency-Specific  
Source Control  
Implementation Plans**

# Source Control Goals

- **Minimize the potential for recontamination**
- **Achieve source control to extent practicable to protect sediment cleanup**
- **Support long-term sustainability and success of future habitat restoration opportunities**

# Strategic Plan: The Basics

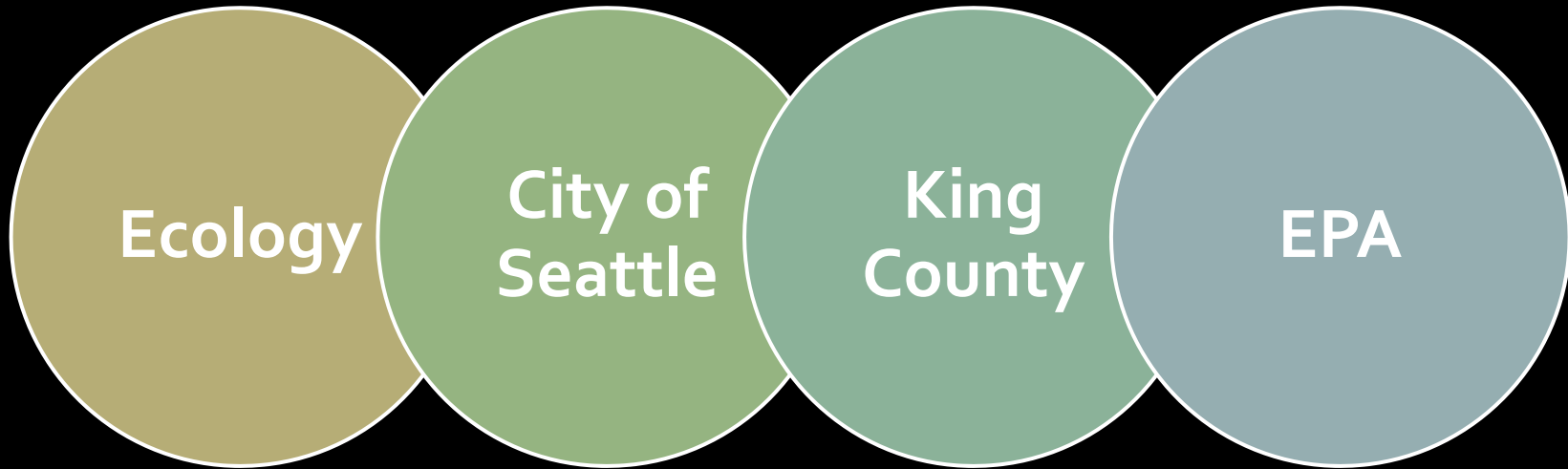
- **What is it?**

- A **longer term plan** that will carry source control work into the future
- **Steps** necessary to continue and improve source control efforts

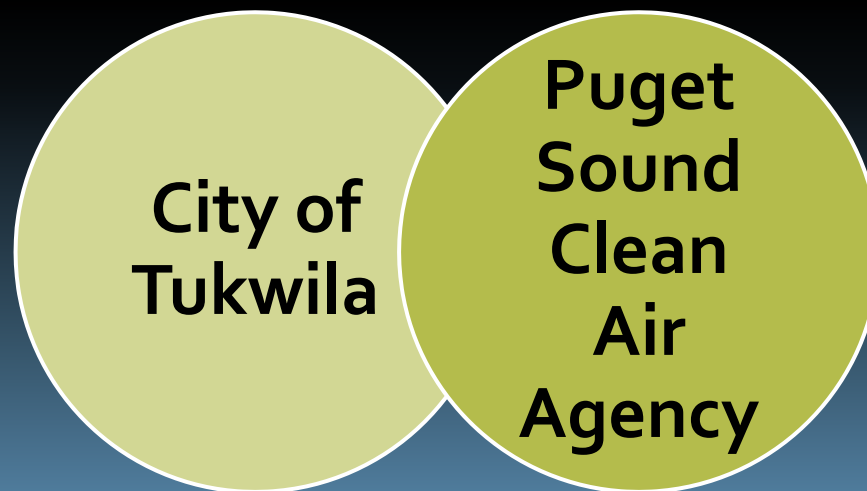
- **What will it do?**

- **Build a framework** for addressing source control
- **Coordinate** efforts among all source control partners
- **Continue** reporting progress

# Regulatory Partners



**Possible  
new  
participants**



# Regulatory Complexity

EPA

CERCLA

OPA

RCRA

TSCA

CWA

Ecology

MTCA

Clean  
Water Act  
Permits

Sediment  
Manage-  
ment  
Standards

County

Local  
Codes

Cities

Local  
Codes

Puget  
Sound Air  
Agency

Federal  
Clean Air  
Act

# Strategic Plan: Main Components

## Source management

- Steps to identify and manage sources

## Sufficiency

- Determination of sufficiency
- Monitoring and sampling

## Reports and Evaluations

- How Ecology will evaluate and report source control work

## Public Involvement

- Components of the source control outreach and environmental justice

## Regulatory Challenges

- Identifies challenges at the state and federal levels (water program, air, cleanup, others)

# Strategic Plan: Framework

- Continue current group structure: **Source Control Work Group**
  - Coordination begins here
- Continue sharing information and details of source control work among agencies
- Possible addition of two new members:
  - City of Tukwila
  - Puget Sound Clean Air Authority

# Strategic Plan Implementation

Mechanism to formalize the commitment between agencies to continue and expand their source control efforts after the Record of Decision

## How?

# Options for Implementation

- Memorandum of Agreement

- Issues

- Enforceability
    - Relationship to the proposed plan and ROD for Sediments

And/ Or

- Agreed Order

- Issues

- Length of time for negotiation
    - Terms of agreement
    - Relationship to the proposed plan and ROD for Sediments

**Other options for implementation?**

# Shared Responsibility for Source Control



**How will Ecology align resources  
to implement the Strategic Plan?**

**Agency-Specific Implementation Plan**

# Ecology's Agency-Specific Plan

## 11 Components

1. Sediment cleanup sequencing, source control priorities
2. Upland site cleanup
3. Development and implementation of Action Plans
4. Management / Tracking of action items
5. Reduction of contamination to stormwater
6. Closer Integration of NPDES with sediments

# Ecology's Agency-Specific Plan:

## 11 Components

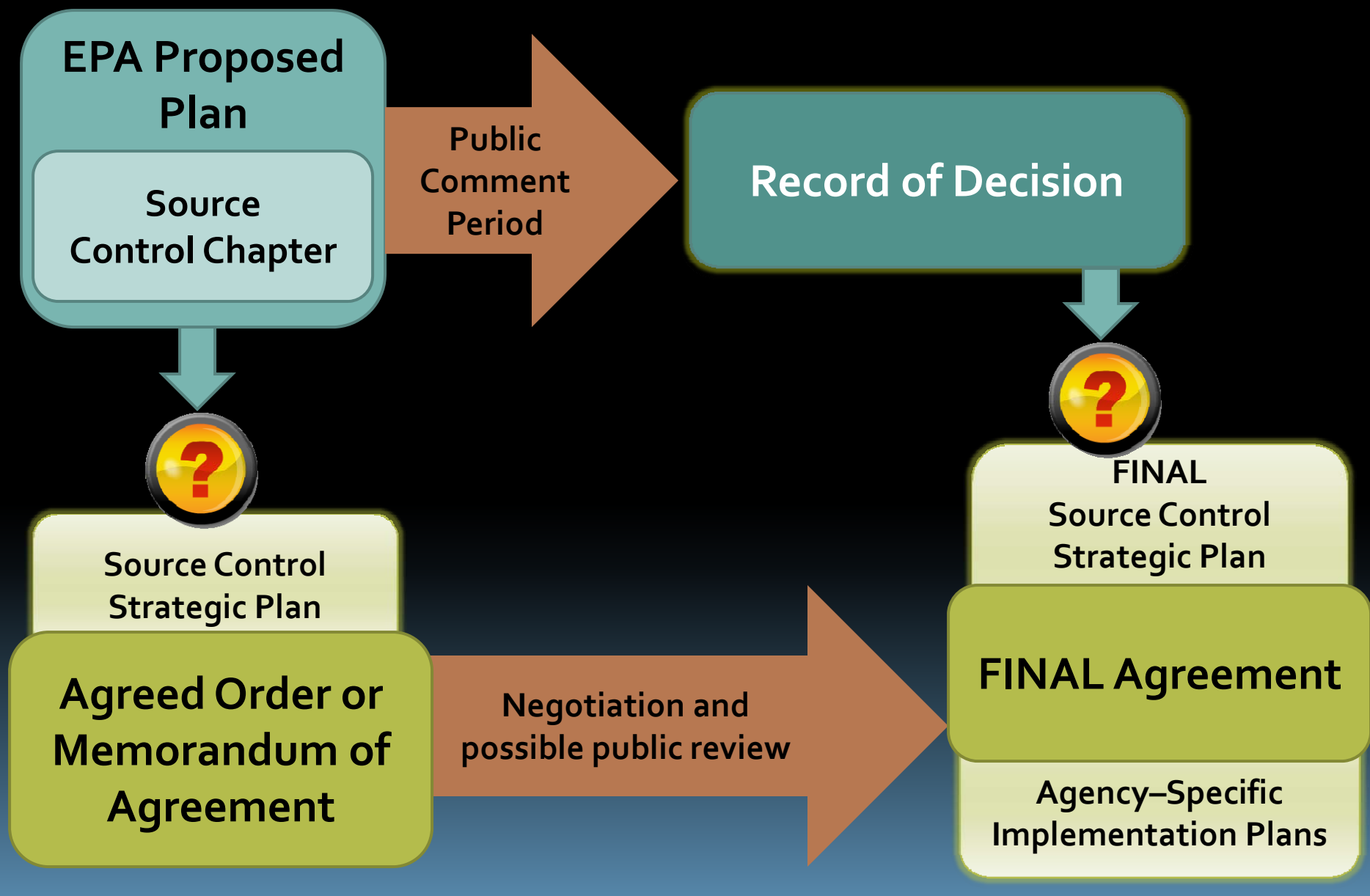
7. Interagency coordination
8. Data gaps
9. Upriver work
10. Reporting (schedule)
11. Education and outreach (schedule)

How does the  
Agency-Specific plan  
relate to the  
Strategic Plan?



**How will these documents relate to the  
Proposed Plan and ROD?**

# Relationship to EPA Process



# Stakeholder Involvement



# Next Steps

## **Spring - Summer**

- Agencies review preliminary draft Strategic Plan

## **Late Summer-Fall**

- Draft Strategic Plan to stakeholders
- Ecology and stakeholder discussions

## **Proposed Plan Comment Period**

- Comment Period for Proposed Plan and Strategic Plan

## **Post-Comment Period**

- Finalize Strategic Plan with municipal and agency partners